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GoDaddy Inc., GoDaddy.com, LLC
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7

8 UNITED STATES DISTRICT COURT
9 DISTRICT OF ARIZONA

10 Crisby Studio AB, a Swedish limited liability
11 company, Niklas Thorin, a Swedish resident,
12 and Prime Loyalty, a New York limited
liability company,

13 Plaintiffs,

14 v.

15 GoDaddy, Inc. a Delaware corporation,
GoDaddy.com, LLC, a Delaware corporation,
16 and 123-Reg Limited, a UK company,

17 Defendants.
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Case No.: 2:24-cv-02165-SMB

**DEFENDANT 123-REG
LIMITED'S NOTICE OF
MOTION AND MOTION TO
DISMISS PLAINTIFFS' FIRST
AMENDED COMPLAINT FOR
LACK OF PERSONAL
JURISDICTION AND FAILURE
TO STATE A CLAIM**

1 TO ALL PARTIES AND ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that Defendant 123-Reg Limited (“123-Reg”) hereby moves
3 this Court for an Order dismissing Plaintiffs Crisby Studio AB, Niklas Thorin, and Prime
4 Loyalty, LLC’s (collectively, “Plaintiffs”) First Amended Complaint (“FAC”), pursuant to
5 Rules 12(b)(2) and 12(b)(6) of the Federal Rules of Civil Procedure.

6 123-Reg Motion’s under Rule 12(b)(2) is made on the grounds that 123-Reg is not
7 subject to personal jurisdiction in this forum. 123-Reg’s Motion under Rule 12(b)(6) is made
8 on the grounds that Plaintiffs: (1) failed to abide by the pleading standards in Fed. R. Civ. P.
9 8, impermissibly lumping together all “Defendants” as a collective whole throughout their
10 allegations in the FAC; and (2) did not set forth sufficient factual allegations to state a claim
11 against 123-Reg, and cannot do so as a matter of law.

12 This Motion is based on this Notice, the attached Memorandum of Law, the
13 concurrently filed Declaration of Andrew Gradon, all pleadings and documents concerning
14 this matter contained in the Court’s file, any other matters of which this Court may take judicial
15 notice, and such further evidence and oral argument as may be presented at any hearing of this
16 Motion.

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18 Dated: November 12, 2024

COZEN O’CONNOR
Jeffrey M. Monhait

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21 By: s/Jeffrey M. Monhait
Jeffrey M. Monhait

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23 Attorneys for Defendants
GoDaddy Inc., GoDaddy.com, LLC,
24 and 123-Reg Limited
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CERTIFICATE OF SERVICE

The undersigned hereby certifies, under penalty of perjury under the laws of the State of Arizona that I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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Counsel for Plaintiffs

Counsel for Plaintiffs

SIGNED AND DATED this 12th day of November, 2024 at Philadelphia, Pennsylvania.

COZEN O'CONNOR

By: s/ Jeffrey M. Monhait
Jeffrey M. Monhait